



OFFICE OF
THE SHERIFF

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DIRECTOR'S OFFICE

RICHARD D. HONGISTO, Sheriff

JIM DENMAN, Undersheriff

November 17, 1976

Corrs Instits... Medical care
Room 333, City Hall
SAN FRANCISCO, CA 94102
Jails
Administration 558-2411
Methods
Civil Division 558-4375
558-4440

climate procedure
Dr. Lorraine Smookler, Acting Director
Department of Public Health
101 Grove Street
San Francisco, Ca. 94102

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Dear Dr. Smookler:

On December 1, 1976, the San Francisco Sheriff's Department will inaugurate a novel Inmate Grievance System (IGS) at County Jails Two and Four in San Bruno (see attachment 1). The system will subsequently be extended to the Hall of Justice as the initial problems are worked out.

As you know, there has been discussion of establishing a medical grievance procedure for over a year now. It seems to me that since I will be receiving written medical complaints on our new grievance forms as of December 1, (see attachment 2), that now is the opportune time to formally set up such a procedure.

In a series of meetings over the last three months with all of the parties concerned, I have put together a proposed interim procedure that I am fairly certain you and Dr. William Mandel will adopt. I have tried to address each of the issues brought out in these meetings.

The idea of this procedure is to amalgamate a simple, workable system for processing medically-oriented complaints with the existing Sheriff's Department procedure operated by the Office of the Jail Ombudsman. Therefore, the Medical Complaint Procedure (MCP) will be considered an addendum to the IGS (see attachment 3). The concepts, principles, and goals of the IGS will be directly applicable to the MCP.

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Dr. Smookler
Nov. 17, 1976

Only the actual "steps" of the procedure and the time limits are different. Attachment 4 is the proposed MCP addendum.

You may have wondered why I have referred to this as an "interim" proposal. It is because a genuinely objective and complete grievance procedure possesses the characteristic of external review, that is, an appeal level that consists entirely of people not employed by either the Department of Public Health or the Sheriff's Department. It is my goal to undertake discussions with you and all other interested parties on attaining this end. Using the Sheriff's Department model, I would perceive an external review step between JMS Director and DPH Director. This outside panel would act in an advisory capacity to you by means of a written recommendation. As the head of the agency, you would always remain as the final appeal.

I realize the sensitive nature of such a move as external review but I believe it represents the ultimate integrity of a grievance system. The Bar Association of San Francisco has a deep commitment to prison grievance procedures and would welcome an opportunity to act as a conduit along with the San Francisco Medical Society in order to establish some form of external review. In fact, the Penal Reform Committee has established a special sub-committee on jail medical care composed of Kathleen Umrein of the District Attorney's Office and Mr. Manoucher Farzan of the Public Defender's Office. They have both been involved with this proposed interim MCP.

I am essentially asking you two things. First, would you authorize my proposal for a MCP to be effective December 1? Second, could we commence discussions on implementing an external review appeal? If you and Dr. Mandel wish to talk about anything that I have said in this letter, please do not hesitate to phore me for a meeting.

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Dr. Smookler
Nov. 17, 1976

Thank you for your continuing cooperation with my office.

Sincerely,



Stephen La Plante
Jail Ombudsman

Enc. (4)

cc: Dr. William Mandel
Dr. Dick Fine
Sheriff Richard Hongisto
Undersheriff Jim Denman,
Don Broadnax
Pat Singer
Bruce Blumberg
Mike Hennessey
Kathleen Umrein
Manoucher Farzan

ATTACHMENT 1

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SAN FRANCISCO SHERIFF'S DEPARTMENT

INMATE GRIEVANCE SYSTEM

I. INTRODUCTION

The concept around which the development of this grievance system occurred was that it is highly desirable to have a structured system through which inmates can initiate grievances concerning policies and actions by staff, with two outstanding characteristics: (1) grievances are initiated by inmates, so that inmates are not in a defensive posture (as in disciplinary procedures) when challenging institutional rules; and (2) one level of appeal within the procedure provides for review by a panel consisting entirely of people not employed by the Sheriff's Office, but who have an interest and expertise in correctional matters.

The attempt has been to devise a system that will provide maximum opportunity for informal and low-level dispute resolution and, at the same time, assure each inmate that his grievance will be reviewed by the Sheriff personally if, by the end of the procedure, the inmate remains dissatisfied with the resolution. The hope is that both inmates and staff will communicate their problems through the procedure and that early resolutions will be worked out wherever possible, and that, wherever possible, both staff and inmates will view the resolution as productive.

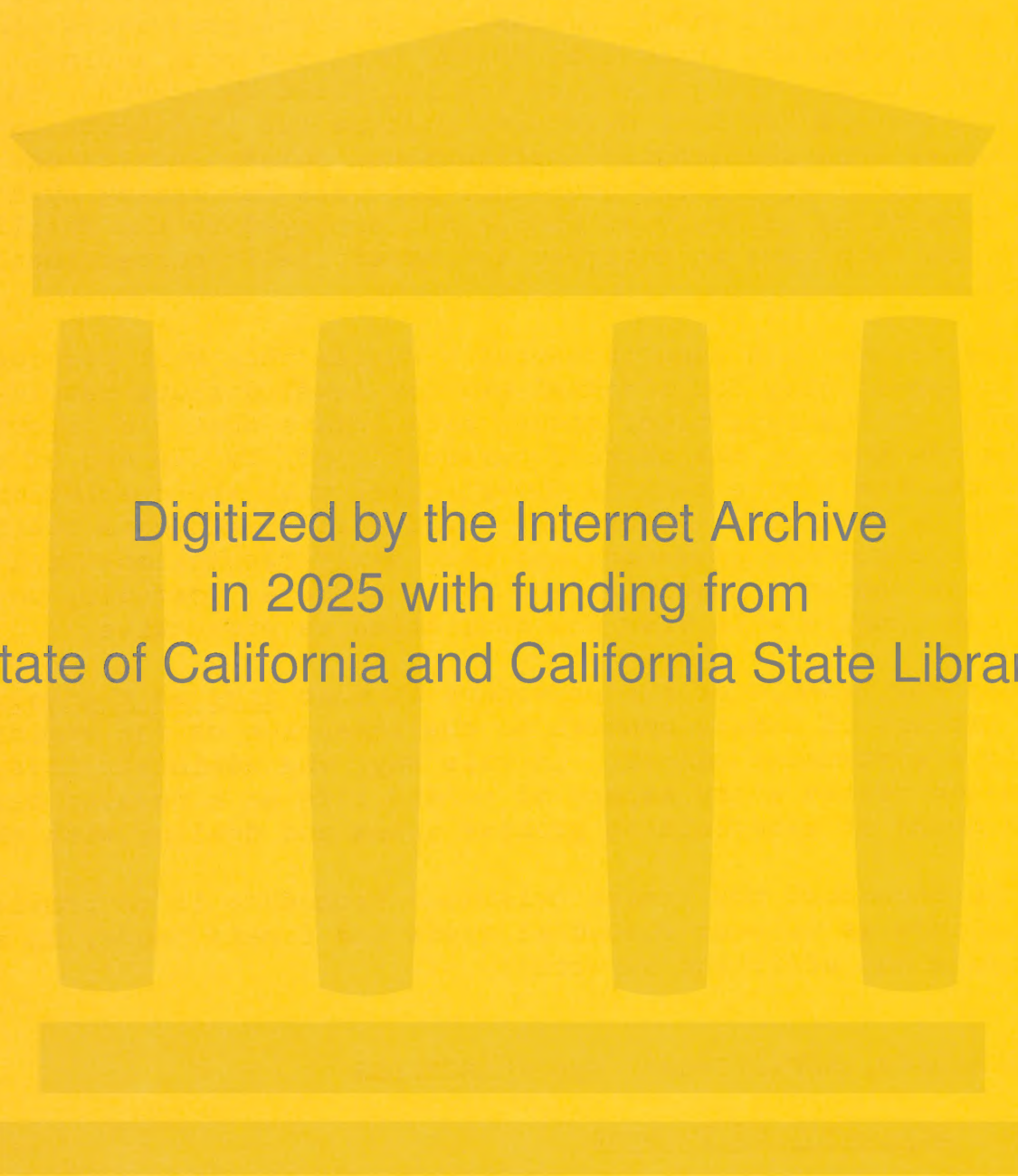
One key feature of the procedure is that inmates themselves bring matters of inmate concern to the attention of the administration in a systematic manner. In this way, the administrators, who cannot review every aspect of inmate life on a regular basis, have a means of ascertaining problem areas and dealing with them.

The attempt of the Inmate Grievance Procedure is to provide a fair balance as between custodial needs and inmate needs, in a creditable and efficient structure.

II. PURPOSES, DEFINITIONS, AND PRINCIPLES

A. Statement of Purpose

The purpose of the formal grievance procedure is to assure that inmate complaints are given full opportunity for fair hearing, consideration, and resolution. The procedure is intended to supplement, not to replace, informal methods of dispute resolution at lower levels.



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Although it is not necessary to exhaust informal methods of dispute resolution before filing a formal grievance, the system will work best if minor matters and even major complaints are first attempted through informal methods.

It is intended that every inmate shall have the right to use the grievance procedure and have easily available to him the information and materials necessary to file a grievance.

B. What is a Grievance: What is Not Part of this System

1. Definition of a Grievance: A grievance is a complaint about the substance of application of any written or unwritten policy of the San Francisco Sheriff's Department or any of its facilities, or a complaint about any behavior or action directed toward an inmate by a Department employee or other inmates, or a complaint about the conditions of confinement.

2. Emergency Procedures: It is the duty of any staff member who is made aware of an emergency grievance (e.g. one which requires immediate action to avoid injury or continued harrassment), either orally or in writing, to immediately communicate the grievance to the Chief Deputy or the institution's highest ranking on-duty officer for evaluation and appropriate action.

3. Major Discipline Complaints: The Sheriff's Department grievance procedure should not be used to review findings of the Disciplinary Review Board. If a grievance concerns the possible imposition of Major Discipline, the grievance should be referred to the Rehabilitation Department. A rehabilitation caseworker shall interview the inmate concerning the request for a Disciplinary Review Board hearing.

4. Minor Discipline Complaints: If a grievance concerns the imposition of Minor Discipline (i.e. up to and including five days in lock-up), the incident will be referred to the Ombudsman, who shall interview all of the parties involved. The Ombudsman shall record his findings in writing and make an alternative recommendation if appropriate.

5. Medical Care: If a grievance concerns substantive medical care or the delivery of health services, the Ombudsman will process it through the established "medical grievance procedure." It shall apply to grievances both in the jails and at San Francisco General Hospital. The Director of the Jail Medical Services in the Department of Public Health will authorize the procedure.

6. Staff Discipline: If a grievance concerns an allegation of a violation of a written Sheriff's Department policy or state law by a staff member (sworn, civilian) which could result in formal discipline (i.e. reprimand, suspension, termination), it shall be referred to the Internal Affairs Division of the Sheriff's Department. Internal Affairs will prepare a written report on its findings for the Undersheriff. The Undersheriff shall decide on a course of action, which must be put in writing with a copy going to the inmate. If either party is dissatisfied with the action taken by the Undersheriff, that party can request the Ombudsman to reopen investigation. The Ombudsman will present his findings in writing and make an alternative recommendation if appropriate.

C. Principles on Which the System is Based

1. Time Limits: Reasonably brief time limits shall be established for the receipt of the responses to grievances and for any action which must be taken to put a response into effect. All responses to a written grievance shall be in writing with reasons for action taken. Lack of a written response or failure to complete action within the required time periods shall entitle the inmate to proceed to the next level of review. The time limit built into this system are:

- a) First Stage: The Ombudsman's Investigator shall complete the investigation and make a recommendation within three (3) working days.
- b) Second Stage: The Grievance Panel, if called, shall meet at its next regular bi-weekly meeting after receipt of the inmate's appeal.
- c) Third Stage: The Undersheriff shall investigate and act within ten (10) working days of receipt of the inmate's appeal.
- d) Fourth Stage: The Community Advisory Committee shall investigate and act within thirty (30) working days of receipt of the inmate's appeal.
- e) Fifth Stage: The Sheriff shall act within ten (10) days of receipt of the inmate's appeal or the advisory opinion.

2. Simplicity: Each step of the procedures should be as simple as possible so that it can be readily communicated and understood, and so that it can be used. Simple forms should be freely available in each living unit, including the hospital and isolation units.

3. Representation: An inmate shall be entitled to select a representative from among other inmates, staff or volunteers regularly participating in the jail and wishing to act as a representative. The representative shall be entitled to attend and participate in any informal conferences, hearings, or reviews in which the grievant participates.

4. Confrontation: To provide a full opportunity for expression, the procedures must bring together in a fair hearing the complaining inmate and the person about whom he/she is complaining, or someone to speak for the policy or condition complained of.

5. Freedom to Complain: Inmate must be assured that no reprisals will be taken against him for using the system. These assurances must extend to both the complaining inmate and any other inmate assisting him in pursuing a solution to his grievance through the course of procedure.

6. Right to Appeal: The right to appeal unfavorable decision: (a) keeps power over disposition of inmates' grievances from being concentrated in one or a few grievances at an early level in the procedure, and (b) gives meaning to the time limits. The final appeal should go to an outside panel selected from the community to assure neutrality.

7. Emergency Procedure: An inmate with an emergency grievance or problem shall have available a course of action which can provide redress within a relatively immediate time.

8. Enforceable Solutions: An effective grievance procedure requires that the proposed solutions be enforceable.

9. Monitoring System: The procedure must contain a way of checking to see that the procedure is operating as designed, particularly that the time limits are being honored and that inmates who use the system are not being punished as a result. The monitoring system can also point up areas of difficulty with the procedure, such as unequal use of the procedure by inmates in different living units, which will suggest aspects of the procedure's operation that need investigation and modifications.

10. Grievances Against Staff: Grievances about employees that may result in punitive actions will be referred directly to the Internal Affairs Division of the Sheriff's Department for investigation and prompt written report to all concerned parties.

11. Low-Level Decision Making: A basic goal of the procedures is the resolution of the grievance at the lowest possible level, preferably by the people closest to the problem (line staff and inmates).

12. Training: The introduction of the grievance system must include a plan for training and orientation of staff and inmates.

13. Notice: A copy of these procedures shall be available through the tier trustee. Additionally, a summary shall be posted on each tier or printed in the inmates' manual.

14. Interpretation of pass procedures: The jail Ombudsman shall interpret these procedures. The decision of the Ombudsman shall be final.

III. PROCEDURES

A. Initiation a Grievance/First Level of Review

1. Each grievance shall be submitted in writing, on forms provided, and either placed in a grievance box located within the institution or given to a deputy or caseworker for delivery to the Office of the Jail Ombudsman. The grievance shall be stated as specifically and briefly as possible. All grievances shall be dated and signed.

2. Each morning a person designated by the Ombudsman shall gather all grievances from the boxes. The designated individual shall deliver them to the Office of the Jail Ombudsman immediately.

3. The Ombudsman shall have each grievance logged and numbered. The Ombudsman shall have one copy of the completed grievance Form #1 delivered to the Chief Deputy.

a) If the subject matter of the grievance does not fall within the limits of this system (medical care, staff discipline, disciplinary complaints or emergencies), the Ombudsman shall refer the grievance to the proper person or agency, sending a copy of the referral to the Chief Deputy and the inmate-grievant.

b) If the basis for the grievance is a Departmental or facility policy or rule, the grievance shall be referred back to the inmate, who may elect to call the Grievance Advisory Panel or appeal directly to the Undersheriff. The Ombudsman shall decide whether the subject is a "policy issue" or not.

c) A hearing on a "policy issue" will serve to:

(1) Collect data from the inmate as to why (s)he believes the policy unreasonable, as well as to explain the existing rationale for the policy as it is understood by the GAP.

(2) Determine as precisely as possible what actual resolution of the grievance the inmate considers reasonable in his/her particular case.

(3) Make a recommendation to the Undersheriff about the policy and a resolution of the immediate grievance.

4. The Investigator shall investigate the grievance, interview the grievant and other relevant parties. If the inmate elects to have a representative assist in the processing of the grievance, that person will also be interviewed by the Investigator.

a) The Ombudsman may at any time confer with or seek the assistance of the watch-commander of the facility in an effort to resolve the grievance in a manner consistent with previous grievances of a similar nature.

b) If the Ombudsman or the Investigator determines the grievance to be frivolous or without merit, (s)he shall indicate the reasons for this decision and return the grievance to the inmate, who may appeal this decision.

5. The Investigator shall complete his/her investigation and make a recommendation on the grievance within three (3) working days.

a) The recommendation shall be submitted to the Ombudsman for approval. An approved recommendation shall be given to the appropriate supervisor (Chief Deputy or Watch-Commander) for approval or rejection. The Investigator shall note the decision and the specific reasons of the supervisor on the grievance form. A copy of the decision shall be given to the grievant. The remaining copy shall be filed in the Ombudsman's Office.

b) If the parties involved accept the decision, a copy of the grievance and the resolution shall be placed in a permanent file.

c) If a grievance cannot be resolved by the Chief Deputy or watch-commander because it involves higher level policy issues (e.g., Departmental or institutional directives), the Investigator shall return the grievance to the inmate, who may call the GAP or appeal directly to the Undersheriff.

d) If the grievant rejects the resolution recommended by the Ombudsman and supervising deputy and wishes the grievance to be aired at a higher level, the inmate shall complete the "appeal" section of the grievance form; and the grievance fully documented as to the issues shall be referred to the next higher level of review (Grievance Advisory Panel or Undersheriff) by placing the appealed grievance in the grievance box.

B. Grievance Advisory Panel

1. The Panel shall consist of: (1) a deputy selected by the Director of Rehabilitation and the Ombudsman from five nominees submitted by the Chief Deputy (at the Women's Jail, the selection shall be from three nominees submitted by the commanding officer of the Women's Jail); (2) an inmate selected by means of a blind

draw from a pool of #1 trustees (Note: at Jail #4, the pool will consist of 6 nominees, three elected from each tier); and (3) a non-voting Rehabilitation officer chosen by the Chief Deputy and Ombudsman from among three nominees of the Director of Rehabilitation, who will serve as the hearing officer. A new inmate member will be selected for each hearing; the other representatives will serve a six month term.

2. The GAP may be convened by the grievant, after receiving the resolution proposed by the supervisory deputy, or after the fourth weekday following the submission of the grievance if no written proposed resolution has been received by the grievant.

3. The GAP shall meet regularly on a bi-weekly basis. If the facts (as determined by the Investigator) warrant an immediate hearing, the Ombudsman may convene the GAP on an "as needed" basis. The GAP may be called only once for a grievance and, if the grievant so chooses, the grievant may bypass the GAP and appeal directly to the Undersheriff.

4. Any party to a grievance (staff or inmate) may "challenge" a board member when it is alleged that the member has had involvement in the immediate grievance or is otherwise specifically prejudiced. The Ombudsman will rule on the challenge.

5. That Panel shall review each grievance submitted. In attendance shall be the grievant and his chosen representative, who may speak for the grievant or assist him/her in the presentation. Also in attendance shall be the staff member being grieved against, if any, or a staff member or inmate who has a vital interest in the matter.

6. The Panel will hear brief verbal presentations and review any pertinent written material.

7. The Panel will assist the parties involved to effect a suitable resolution satisfactory to the parties involved.

8. GAP hearings should be conducted as informally as possible. If there is a staff member against whom the grievance is filed, he/she shall be present, and the hearing officer of the Panel shall attempt to conduct the meeting in as non-adversary a manner as possible. The Panel must hold a hearing in a manner such that the inmate filing the grievance has ample time and assistance to prepare and present his/her side of the story and the facts as he/she sees them. It is anticipated that many hearings may be very short and may result in an immediate resolution.

9. The GAP shall state its findings and recommendation in writing and shall distribute copies as follows: inmate-grievant,

Undersheriff, Chief Deputy, Ombudsman, and any other parties the GAP considers particularly affected by the recommendation. There shall be separate recommendations if no consensus is arrived at among the voting members.

10. A copy of the GAP recommendation shall be delivered to the Undersheriff, who shall determine what course of action shall be taken. Recommendations of the GAP are not binding on the Undersheriff, but shall be given careful and serious consideration. A decision which differs from the recommendation should be accompanied by a statement explaining the reasons for not following the recommendation.

C. Review by Undersheriff

1. The grievant may appeal the Chief Deputy's decision to the Undersheriff.

2. The grievance, fully documented as to issues and prior decisions and recommendations, will be submitted to the Undersheriff for investigation and review.

3. The Undersheriff will conduct whatever investigation he deems necessary prior to his determination.

4. The Undersheriff will render his written decision within ten working days from receipt of the grievance.

5. The grievant may appeal the Undersheriff's decision either to the CAC or directly to the Sheriff. Once this option has been exercised, the grievant may not alter the choice, unless all parties agree otherwise.

If the grievant appeals directly to the Sheriff and bypasses the CAC, the Sheriff shall make a final decision regarding the grievance.

D. Review by Community Advisory Committee

1. In cases where outside review is requested, a CAC shall be formed, consisting of:

- a) A person appointed by the Penal Reform Committee of the San Francisco Bar Association.
- b) A member of the community appointed by the Prisoner's Union, or by Delancy Street Foundation, at the grievant's direction.
- c) A person appointed by Community Dispute Services/American Arbitration Association, who shall have prior experience in conducting outside review hearings. This individual

shall act as chairperson of the CAC. Note: In cases involving a woman grievant, at least one member of the CAC shall be a woman.

2. The CAC shall be an ad hoc committee. Therefore, a new committee shall be appointed for each grievance when CAC review is requested.

3. The CAC may be convened only once for a particular grievance. It may be convened at the request of the grievant after the Under-sheriff has rendered a decision in accordance with section D5.

4. The CAC must be convened within 20 working days, or the parties waive their right to convene the CAC.

5. When convened, the CAC will conduct a hearing, to be administered by CDS/AAA according to rules and procedures to be established, concerning the grievance and may investigate the matter further if necessary. The CAC shall consider all documentation relating to the grievance and may hear in person the appealing party or his/her representative, if that person wishes to make a personal presentation. The CAC may hear other relevant witnesses, but no staff member or inmate may be made to testify before the Committee against his/her wishes.

6. The CAC will conduct its hearing and investigation and issue its recommendation to the Sheriff within 30 days of receipt of the grievance.

E. Review by Sheriff

1. Direct Review.

In grievances appealed directly to the Sheriff, and where the CAC is not convened, the procedure followed will be identical to that detailed in D1 through D4 above.

2. Review after CAC recommendation.

- a) In grievances where the CAC has been convened and has issued a recommendation to the Sheriff, the Sheriff shall render a final decision accepting or rejecting the CAC's recommendation within ten working days from receipt of that recommendation.
- b) Any decision rejecting the CAC's recommendation shall be accompanied by a written statement of the reasons for the rejection, and shall be based on one or more of the following grounds:

- (i) implementation of the CAC's recommendation would be contrary to law;
- (ii) implementation of the CAC's recommendation would endanger the public and/or institutional safety or security;
- (iii) implementation of the CAC's recommendation is not fiscally possible;
- (iv) the CAC's recommendation goes beyond the scope of the issues presented in the case.

The written statement of reason(s) for rejection shall make reference to specific facts supportive of the reason(s) given.

- c) If the Sheriff's final decision rejects the CAC's recommendation, the CAC may, in its discretion, make its recommendation, and any findings supportive thereof, public.

GRIEVANCE FORM NO. 2

COMPLAINT #

22/

DATE RECEIVED

TO: _____

GRIEVANT

SUBJECT OF COMPLAINT: _____

RECOMMENDATION OF GRIEVANCE PANEL: _____

BASIS FOR DECISION: _____

GAP MEMBERS PRESENT: _____

HEARING OFFICER: _____

DEPUTY: _____

PRISONER: _____

DECISION OF UNDERSHERIFF: _____

REASONS: _____

SIGNATURE _____ DATE _____

I WISH TO APPEAL THIS DECISION TO: (CHECK ONE)

☐ COMMUNITY ADVISORY COMMITTEE ☐ SHERIFF

STATE SPECIFICALLY WHY YOU WISH TO APPEAL: _____

SIGNED: _____

(GRIEVANT)

November 14, 1976

SUMMARY OF INMATE GRIEVANCE SYSTEM

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DEFINITION: A grievance is a complaint about the substance or application of any written policy of the San Francisco Sheriff's Department or any of its facilities, or a complaint about any behavior or action directed toward an inmate by a Department employee or other inmates, or a complaint about the conditions of confinement.

INITIATING A GRIEVANCE: Each grievance shall be submitted in writing, on forms provided, and either placed in a grievance box located within the institution or given to a deputy or caseworker for delivery to the Ombudsman. The grievance shall be stated as specifically and briefly as possible. All grievances shall be dated and signed. One copy of the completed form will be delivered to the Chief Deputy.

STEPS OF APPEALS:

1. Ombudsman's Investigator to open box, screen forms, obtain any clarification, investigate and report findings to Ombudsman. If legitimate, will make recommendation to watch commander and/or Chief Deputy within three (3) working days.
2. The Grievance Advisory Panel (GAP), if called, shall meet bi-weekly to review accumulated appeals. It shall be composed of a deputy, a prisoner, and a non-voting caseworker, who will act as the hearing officer. If prisoner and deputy are unable to agree, then separate recommendations will be submitted to the Undersheriff.
3. The Undersheriff shall investigate and/or receive GAP's recommendations and act within ten (10) working days of receipt of inmate's appeal.
4. The Community Advisory Committee (CAC) shall investigate and act within thirty (30) days of receipt of inmate's appeal. It shall be composed entirely of people outside the jail system: a person appointed by the Penal Reform Committee of the Bar Association, a person appointed by the Prisoners Union, or Delancey Street, and either a labor or community arbitrator appointed by the American Arbitration Association to act as the chairperson.
5. Sheriff will act within ten (10) days of receipt of the inmate's appeal or the advisory opinion.

EXCEPTIONS: Major discipline will be reviewed by the Disciplinary Review Board (DRB).
Minor discipline will be reviewed by the Ombudsman.
Medical grievances will be put through the "Medical Complaint Procedure".
Allegations of deputy misconduct will be investigated by the Internal Affairs Division of the Sheriff's Office.

ADDENDUM: MEDICAL COMPLAINT PROCEDURE (Proposed)

INITIATING A GRIEVANCE: Each grievance shall be submitted in writing, on forms provided, and either placed in a grievance box located within the institution or given to a deputy, case-worker or civilian medical worker for delivery to the Ombudsman. The grievance shall be stated as specifically and briefly as possible. All grievances shall be dated and signed. Jurisdiction of medical complaints includes prisoner-patients at S.F. General Hospital (emergency room, clinics, jail wards.)

STEP ONE: Ombudsman's investigator receives grievance form and reviews to determine if clear and understandable; if unclear, then will take back to prisoner in order to clarify details of grievance and the remedy that is being sought; categorize into one of three types: diagnostic treatment, procedural, personnel; then will discuss grievance with the head nurse of the facility to see if resolution can be reached. A copy of the completed form will be given to the prisoner within 2 working days by the Ombudsman's office.

STEP TWO: Jail Medical Director's Designee will conduct further medical investigation and make a recommendation to appropriate party, e.g., attending physician, head nurse, jail medical director. A copy of the completed form will be returned within 3 working days to the Jail Ombudsman's Office who will see that the prisoner receives a copy.

STEP THREE: Jail Medical Services (JMS) Director will review the case if appealed. He may order further investigation, if necessary. A copy will be returned within 5 working days to the Jail Ombudsman's office who will see that the prisoner receives a copy.

STEP FOUR: Director of Public Health will review the case if appealed. She may also order further investigation if necessary. A copy will be returned within 10 working days to the Jail Ombudsman's office who will see that the prisoner receives a copy.

EXCEPTION: Personnel grievances regarding DPH employees will not be processed through this procedure but instead referred directly to JMS Director. Complaints about PHP employees will be referred to the PHP Director.

ATTACHMENT #4

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